

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

SUNY VICTOR,	)	CASE NO.: 1:14CV2731
Plaintiff,	)	
	)	JUDGE JAMES S. GWIN
vs.	)	
	)	MAGISTRATE JUDGE NANCY VECCHIARELLI
JAMES GILLETTE, et al.,	)	
	)	<u><b>AFFIDAVIT OF DEFENSE COUNSEL</b></u>
Defendants.	)	

Affiant makes the following statements of his own knowledge and information.

1. Affiant is defense counsel for Defendant Sheriff Daniel C. McClelland in the above-captioned matter.
2. Affiant graduated from Case Western Reserve School of Law in 1971, and was admitted to the practice of law in Ohio in 1971.
3. Affiant is admitted to the U.S. District Courts for the Northern District of Ohio and Southern District of Ohio. Affiant is admitted to the Sixth Circuit Court of Appeals, and to the Supreme Court of the United States.
4. Affiant has served as Law Director for the Cities of Wickliffe and Brunswick, Ohio. Affiant has represented political subdivisions and public officials in Ohio since the mid-1970s, and has served as lead trial counsel in all the federal district courts in Ohio.
5. Affiant served as lead trial counsel in this instant case.
6. A reasonable charge for defense services in this type case would be \$250.00 per hour.
7. Affiant and the firm Mansour Gavin LPA expended considerable hours in defending this action, including the responsive pleadings and Motions for Summary Judgment. Affiant's firm expended two hours in the preparation of a Motion for Attorney Fees.



8. Affiant's firm has or will bill client for legal services on this matter and expenses a total of \$8,990.10. That does not include any time to respond to Plaintiff's recent 52 page objection to the Court's dismissal of this case.
9. A reasonable award of attorney fees to affiant's firm from Plaintiff for the defense of a frivolous and vexatious action would be \$8,990.10.

FURTHER AFFIANT SAYETH NAUGHT



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TIMOTHY T. REID (#0007272)